

August 23, 2001

ITEMS FOR DISCUSSION – B333/B111 CONCRETE

- 1) Understand that Dyan has written a letter on staging B111 concrete. See Dave K. and other e-mails around 8/15. "Stockpile" vs "in progress" issues. Where is Dyan's letter?
- 2) State believes B333 should be identified as an IHSS or PAC?
- 3) B333 sampling proved to be for TCLP, not total metals. 8/21 e-mail.
- 4) Sampling of soils at B333 (below hopper). STATE wants total metal results! At least 3 samples. Suggest that based upon B111 being completed first, that rather than perform samples, we waste all concrete from B333. This may not totally satisfy the STATE, but ER will take samples once the slabs are removed.
- 5) How best to respond to the STATE? DOE did not like recent response for Dyan on Air Monitoring for the guard towers.



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ADMIN RECCRD

B111-A-000010

Guthrie, Vern

From: Parsons, Duane
Sent: Tuesday, August 21, 2001 11:57 AM
To: Guthrie, Vern
Subject: FW: 333 Total Data

I talked to Nick Demos - he stated that he was incorrect when he told you that we had taken Total samples. Only TLCP samples were taken in 333.

Duane Parsons
RISS Facility Characterization Coordinator
Phone: 303-966-6458
Pager: 303-212-3734
Fax: 303-966-6678

-----Original Message-----

From: Demos, Nick
Sent: Monday, August 20, 2001 6:10 PM
To: Parsons, Duane
Subject: RE: 333 Total Data

give me a page @212-6159

-----Original Message-----

From: Parsons, Duane
Sent: Monday, August 20, 2001 11:05 AM
To: Demos, Nick
Subject: 333 Total Data

Vern said you know of some 333 total data. Can you show me where it's at? I can show you where the 333 data is filed.

Duane Parsons
RISS Facility Characterization Coordinator
Phone: 303-966-6458
Pager: 303-212-3734
Fax: 303-966-6678

Guthrie, Vern

From: Demos, Nick
Sent: Friday, August 17, 2001 2:58 PM
To: Guthrie, Vern
Cc: Primrose, Annette; Luker, Steve
Subject: RE: Gwen Project and B333

Well Vern, Item 1, I heard a rumor that we were trying to use the concrete for one of the dams. That was mentioned early on then went away then came back..fact is, we should wait the two weeks (turnaround time) even though I would bet my paycheck right now that the soil does not exceed action levels for Chrome. It would get dicey if we sent the debris to Erie and then observed elevated Chrome in the surrounding soils.

Item 2, We collected samples (for all metals) of the aggregate below the North hopper. The lab would not have kept the sample this long but that seems irrelevant since what CDPHE is really pushing for is 333 adjacent soil. Cameron has a copy of the data from "outside" (the aggregate metal stuff). All other data was from paint inside and grit from West Blast room and both hoppers. Steve Luker can help you. The 333 Characterization report is avail. electronic, or page me @ 212-6159.

-----Original Message-----

From: Guthrie, Vern
Sent: Wednesday, August 15, 2001 4:29 PM
To: Demos, Nick
Subject: Gwen Project and B333

Good afternoon Nick,

I have two items that you can help me with:

- Item #1 - Recently soil samples were taken in the Gwen area to determine if the spray mist got as far east as the towers. The concrete is now broken up into a size that can be easily handled. Can the concrete be placed in roll-offs and sent to the landfill? I believe that the answer is: wait until the results are back. Just trying to speed up disposal of the concrete! Are we looking at a two week turnaround for the results?
- Item #2 - B333 has stuck its ugly head up again. The STATE has asked if the samples taken were for all metals. They have concern that the blasting (grit) material and the material in the hopper were not fully analyzed. They are also asking for soil samples around the building. I believe that we may be able to stop that need if the we can show no issue with the grit/hopper material. Do we have the ability to get another lab run for total metals from previous sampling (lab still has some material?) or do you or the sampling team still have any sample material?

Let me know what you find out.

Thanks,

Vern
X7419

Guthrie, Vern

From: Tower, Steven
Sent: Monday, August 20, 2001 1:03 PM
To: Foss, Dyan
Cc: Gerdeman, Fred; Stevens, Jeffrey; Prymak, William; Gibbs, Frank; Guthrie, Vern; Chritton, Michael; Nininger, Robert; Blake, Chad; Bean, Curtis
Subject: RE: Enhanced Ambient Air Monitoring Results, Building 779 Cluster Demolition Monitoring & Related Events

GUARD TOWERS

The justification below is the same kind of arguments we hear from CDPHE and the cities for doing monitoring and we tell them that we won't monitor because there is no good reason to. I would be embarrassed to make such an argument with Dave or the cities, it would be hypocritical.

From: Dyan Foss/RFFO1/USDOE@EXCHANGE on 08/20/2001 12:35 PM
To: Steven Tower/doi/rffo@RFFO, Fred Gerdeman/doi/rffo@RFFO, Jeffrey Stevens/RFFO1/USDOE@EXCHANGE, William Prymak/doi/rffo@RFFO, Frank Gibbs/RFFO1/USDOE@EXCHANGE, Vern Guthrie/RFFO1/USDOE@EXCHANGE
cc: Michael Chritton/RFFO1/USDOE@EXCHANGE, Robert Nininger/RFFO1/USDOE@EXCHANGE, Chad Blake/RFFO1/USDOE@EXCHANGE, Curtis Bean/RFFO1/USDOE@EXCHANGE, Denny Ferrera/RFFO1/USDOE@EXCHANGE

Subject: RE: Enhanced Ambient Air Monitoring Results, Building 779 Cluster Demolition Monitoring & Related Events

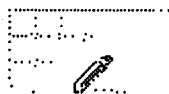
Sorry it's taken me so long to get back to you on this, but I wanted to make sure I knew what we had committed too. The Soil Disturbance Permit does indicate that air sampling will be conducted, but this sampling is for radiological control/industrial hygiene purposes - not environmental monitoring. There is no specific environmental monitoring (close-in or otherwise) planned for the guard tower demolition project. The sampling proposed is being conducted because the soils around the guard towers are below Tier II levels, but above background. There is no regulatory requirement to do this sampling; it's being implemented as a best practice and the results will be filed with the soil disturbance permit.

How do you want to clarify this issue with Dave. Dyan-7577

-----Original Message-----

From: Tower, Steven
Sent: Wednesday, August 15, 2001 2:35 PM
To: Gerdeman, Fred; Stevens, Jeffrey; Foss, Dyan; Prymak, William; Gibbs, Frank; Guthrie, Vern
Subject: Re: Enhanced Ambient Air Monitoring Results, Building 779 Cluster Demolition Monitoring & Related Events

I found out from the RISS rad control people on the fence project yesterday that they plan close in air monitoring of the guard tower demolition. I wouldn't have cared except that they shared this information with Dave Kruchek. This may be a solid shot to our collective foot.



Fred Gerdeman
08/14/2001 05:26 PM

To: Jeffrey Stevens/RFFO1/USDOE@EXCHANGE, Dyan Foss/RFFO1/USDOE@EXCHANGE, William

cc:

Subject: Re: Enhanced Ambient Air Monitoring Results, Building 779 Cluster Demolition Monitoring & Related Events

I have asked Jon Dion to hold the line on close-in monitoring during demolition until the State provides a reasonable argument (logic, science, drivers) and a description of how the data will be used. (The heck of it is that if they'd come up w/ these, we'd actually support it.)

The State's attached analysis is pitiful. Its weakness is summarized in their last sentence -- they still don't have a clue what they're looking for or what they're going to do with the info. Tarlton's the primary person who could bring them back to reality and have them do a valid analysis, but lately he's not been inclined to do so.

Nininger's continued involvement is critical, because of his technical and regulatory knowledge.

----- Forwarded by Fred Gerdeman/doe/rffo on 08/14/2001 05:13 PM -----



"Steve Tarlton" <starlton@smtpgate.dphe.state.co.us> on 08/13/2001 04:13:03 PM

To: <clyons@ci.arvada.co.us>, <hmahan@ci.broomfield.co.us>, <kschnoor@ci.broomfield.co.us>, <sgarcia@ci.broomfield.co.us>, <mharlow@ci.westminster.co.us>, <kleeman.gary@epamail.epa.gov>, <maryf@northglenn.org>, <Edd.Kray@rf.doe.gov>, <Jonathan.Dion@rf.doe.gov>, <nstenger@rfcab.org>, <manderson@rfclog.org>, <jeb.love@state.co.us>, <rich.horstmann@state.co.us>, <steve.tarlton@state.co.us>, <tony.harrison@state.co.us>
cc: <Fred.Gerdeman@rf.doe.gov>, "ARCH Crouse" <ancrouse@smtpgate.dphe.state.co.us>, "GORDON Pierce" <gepierce@smtpgate.dphe.state.co.us>, "STEVE Gunderson" <sgunders@smtpgate.dphe.state.co.us>

Subject: Re: Enhanced Ambient Air Monitoring Results, Building 779 Cluster Demolition Monitoring & Related Events

Attached are the CDPHE comments on the B779 monitoring results. Since we do not concur that these results show that close in monitoring is not required, we have included our revised proposal for the close in monitoring.

Please note that we believe we have previously reached agreement on Be monitoring "as close as practical" during demolition. The above comments do not address changes to Be monitoring.

Please contact me if you have questions or concerns regarding our comments or proposal.

Steve Tarlton
303-692-3423

- combined779airmoncmt_2.doc << File: combined779airmoncmt_2.doc >>

Guthrie, Vern

From: David Kruchek [dakruche@smtpgate.dphe.state.co.us]
Sent: Wednesday, August 15, 2001 8:53 AM
To: Vern.Guthrie@rfets.gov
Cc: edd.kray@rf.doe.gov; Steven.Tower@rf.doe.gov; Frank.Gibbs@rfets.gov; steve.nesta@rfets.gov; Carl Spreng; Denise Onyskiw; Elizabeth Pottorff; JAMES Hindman; STEVE Gunderson; Steve Tarlton
Subject: RE: Contact Record for B111, 333, 132 pad, & Air Force Tower

Vern,

Thank you for your reply to my request for additional information regarding B111 and B333 demolition and waste disposal. Based on these responses and our discussion of issues yesterday I have the following comments:

Concrete is not "clean" unless the analytical results from the "totals" analysis shows the levels of Hazardous Constituents of concern are below "risk based" levels, groundwater protection levels, or background. The TCLP analysis that was performed is only useful to determine the proper disposal as hazardous waste, into a Subtitle C landfill, or solid waste, into a Subtitle D landfill. The TCLP results can not be used to determine if the concrete is "clean".

Totals analysis were performed on B111 concrete samples. A review of the levels of metals of concern in the concrete indicated that there did not appear to be any concerns with the levels of metals in the concrete from the chemicals associated with the photo lab. The totals levels were at or below levels of concern. As such the concrete can be considered as clean inert material per the concrete recycling RSOP.

However, no such "totals" analysis appear to have been performed on the concrete or dust/grit samples from B333. As such, we can not make the determination that the concrete from this building or area is clean. Therefore it can not be used as clean fill per the concrete recycling RSOP. A minimum # of additional samples (3) can be collected, or if enough of the previously collected samples remain then these could be analyzed for total metals. Samples in the most potentially contaminated areas need to be collected and analyzed, this would be in the "sand" blast area and hopper area. Also, the dust/grit needs to be analyzed for totals to determine the environmental concerns and proper disposition of this material, as well as safety concerns during demolition activities. If samples (3) of the dust/grit are analyzed for totals and it does not contain excessive levels of metals, then this may also be used to help characterize the concrete.

YES PER NICK DEMOS - 8/17 E-MAIL
FOR BELOW HOPPER!

>>> "Guthrie, Vern" <Vern.Guthrie@rfets.gov> 08/09/01 04:58PM >>>

Dave,
This information is provided in response to your recent communication. The responses are formatted to correlate with the question numbers set in your original communication.

1) The concrete pad (floor) will be sent to the Erie Landfill as bulk PCB waste. The walls and other areas may be used as fill material in B111.

This decision is based upon sampling data that Duane has. I believe that

this information as been previously transmitted to you. If not, we can certainly provide. There are no issues with the soil around B333 as shown by sampling results. As you remember, samples were taken under the west hopper and they identified only iron present. ER will collect samples to verify that the soil is uncontaminated once the structure is removed. This area has never been identified as a PAC or IHSS.

2) The former Air Force Tower is not located in either of the East Spray Field IHSSs. However, it is near these IHSS locations and there is some evidence that spray evaporation may have occurred near this area. Because of the nature of the work, no additional requirements are necessary to protect the workers or to determine the appropriate waste disposition as a result of these nearby activities. However, as previously agreed, additional soil samples will be collected in this area to address any remaining concerns by CDPHE.

3) As you are aware, we have discussed the "stockpile" of concrete on several occasions. We also discussed the "work in progress Vs stockpile" issue. For building 111 we will provide a letter through DOE identifying the stockpile site and that the site meets the criteria established in the RSOP.

DUAN WRITE LETTER - WHERE IS IT?

4) The final disposition of the B111 slab has been coordinated with the ER group. There are no slope stability issues in the area that would cause concerns over ponding of groundwater. The remaining basement structure will be backfilled concrete and compacted soil. Because of the nature of concrete, there will still be groundwater flow through the B111 area and basement and holes in the slab will not be required.

The sanitary drains were flushed during building closure and a camera was sent through the drains to verify that there was minimal holdup within these drains. Because of the nature of the building operations, and because there is no soil contamination associated with B111 or the upgradient area, the B111 sanitary drains will not be foamed or plugged. However, as part of closure, ER does plan to foam, plug or otherwise disposition the main lines of the sanitary sewer system to reduce or eliminate this system as a potential contaminant migration pathway after closure. This will be documented in the ER closeout report for this activity.

I hope this information addresses all of your concerns.

Will see you on Tuesday for the B705 walkdown

Vern

> -----Original Message-----

> From: David Kruchek [SMTP:dakruche@smtpgate.dphe.state.co.us]

> Sent: Thursday, August 02, 2001 11:59 AM

> To: vern.guthrie@rfets.gov

> Cc: steven.tower@rf.doe.gov; frank.gibbs@rfets.gov; Carl Spreng;

> Elizabeth Pottorff; Steve Tarlton

> Subject: Contact Record for B111, 333, 132 pad, & Air Force Tower

>

> Vern,

>

> Having reviewed the information provided with the Contact Record
> regarding Removal of the concrete associated with the former Air Force

> Tower, 132 pad, and B111 & 333, I have the following comments:

>

> 1. Previous documents indicated that the concrete generated during D&D

> demolition of B333 was to be identified as PCB contaminated and shipped

> offsite for proper disposal. However, in this discussion the associated

> concrete pads are now indicated to possibly be recycled per the Concrete

> RSOP. Please provide a specific disposal decision for this concrete

> associated with B333. Previous correspondence has identified our

> concerns with the soil and concrete associated with B333, specifically

> levels of metals. Although this area has not previously been identified

> as an IHSS or PAC, we have previously discussed our concerns that this

> area should be identified as a PAC or IHSS. Until these concerns are

> properly addressed, and appropriate samples and analysis have been

> conducted, we can not agree that the concrete is clean or

> free-releasable, and can not be considered for recycling.

>

> 2) Based on the Buffer Zone Technical Report performed by us, and as
> previously discussed, the Former Air Force Tower appears to be located

> in the East Spray Field IHSS. Since this discussion incorrectly states

> that this is not the case, please provide corrected

> material/requirements based on it being located within an IHSS.

>

> 3) As previously discussed, concrete that is intended to be recycled

> per the Concrete RSOP, must follow the process outlined in the RSOP.

> This includes DOE providing us a letter report identifying that the

> stockpile site meets the established criteria (Section 7 of the RSOP).

> and that the proposed backfill site meets the established criteria

> (Section 8 of the RSOP). We then have 14 days to concur with the

> proposal. This is a specific concern if any concrete stockpiling or

> backfilling is to be proposed for B111.

>

> 4) As a separate issue, allowing the B111 slab to be left in the ground

> requires that it does not interfere with ER or groundwater issues.

As

> such, there needs to be some documentation that ER and groundwater have

- > determined that this slab may be left in the ground and any requirements
- > that they may place on leaving the slab. Such as preventing a "bathtub" effect by placing holes in the slab, or collecting appropriate soil
- > samples if necessary or the final flushing and plugging of the sanitary
- > drains. Documentation will need to be placed in the Closeout Report.